IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

| IN RE: Robert Bidniuk |) | Chapter 13 |
|--|---|------------------------|
| Debtor |) | Case No. 1:19-bk-01658 |
| |) | |
| Toyota Motor Credit Corporation |) | |
| Movant |) | |
| |) | |
| Robert Bidniuk |) | |
| Respondent |) | |
| Charles DeHart, III, Trustee |) | |

DEBTORS' RESPONSE TO TOYOTA MOTOR CREDIT CORPORATION MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. 362 PURSUANT TO BANKRUPTCY PROCEDURE RULE 4001

- 1. Movant, Toyota Motor Credit Corporation, filed its Motion for Relief from Stay on February 12, 2020.
- 2. Debtor admits to being behind on payments.
- 3. Debtor would like the opportunity to catch up on missed payments.
- 4. Debtor requests the Court deny Movant's Motion for Relief.

WHERFORE, Debtor, Robert Bidniuk, prays the Court enter its order denying the Motion for Relief from the Automatic Stay that was filed February 12, 2020 by Toyota Motor Credit Corporation.

Dated: February 13, 2020 Respectfully Submitted,

/s/Stephen Wade Parker

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